

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

|                                   |   |                                  |
|-----------------------------------|---|----------------------------------|
| <b>STATE OF OKLAHOMA, et al.,</b> | ) |                                  |
|                                   | ) |                                  |
| <b>Plaintiffs,</b>                | ) |                                  |
|                                   | ) |                                  |
| <b>v.</b>                         | ) | <b>Case No. 05-cv-329-GKF-SH</b> |
|                                   | ) |                                  |
| <b>TYSON FOODS, INC., et al.,</b> | ) |                                  |
|                                   | ) |                                  |
| <b>Defendants.</b>                | ) |                                  |

**THE PLAINTIFF, THE STATE OF OKLAHOMA, STATES THAT AT THE  
HEARING ON DECEMBER 5, 2024, THE FOLLOWING STIPULATION WAS  
PRESENTED BY THE PARTIES:**

The State of Oklahoma (“the State”) and Defendants, hereinafter collectively referred to as “the Parties,” hereby submit this Joint Stipulation regarding the State’s expert witness, Katie Mendoza.

The Parties agree that the State’s expert report of Katie Mendoza, attached hereto as OKLA\_PX\_0372, shall be accepted by the Court as the State’s evidentiary proffer as to what Ms. Mendoza would have opined had she been allowed to testify at the evidentiary hearing.

The Parties agree that Defendants and Defendants’ experts will not testify, rely upon, or otherwise attempt to introduce into evidence or elicit testimony regarding the Upper Illinois River Watershed (“UIRW”) model, otherwise known as the Arkansas SWAT model, or the Arkansas Department of Agriculture, Upper Illinois River Watershed Management Plan, dated October 2024.

The Parties further agree that the National Pollutant Discharge Elimination System (NPDES) data for the years 2007 to 2020, attached hereto as OKLA\_PX\_0374, shall constitute Ms. Mendoza’s testimony regarding wastewater treatment plants in the Illinois River Watershed and shall be admitted into evidence without objection.

Respectfully Submitted,

s/ Jennifer L. Lewis

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of December 2024, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the ECF registrants with entries of appearance filed of record.

s/ Kristopher E. Koepsel  
Kristopher E. Koepsel